



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

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July 30, 2015

Mr. Brad Wamsley
L-3 SSG
65 Jonspin Road
Wilmington, Massachusetts 01887

RE: Modified Final Approval of LPA for
Non-Fuel Emissions
L-3 SSG
17, 46, and 65 Jonspin Road
Wilmington, Massachusetts 01887
Transmittal No. W083867
Application No. MBR-06-IND-019
FMF No. 334887

Dear Mr. Wamsley:

The Northeast Regional Office of the Massachusetts Department of Environmental Protection (“MassDEP”), Bureau of Air and Waste, has reviewed your Limited Plan Application (“Application”) listed above. This Application concerns the existing approved process at your facility located at 65 Jonspin Road, Wilmington, Massachusetts (“Facility”). MassDEP then approved the Facility to expand design and manufacturing operations of optical equipment at the subject Facility on August 4, 2006.

On May 28, 2015, L-3 SSG submitted a request to change the name of the facility from “L-3 SSG-Tinsley” to “L-3 SSG” and include the building located at 46 Jonspin Road under the same facility-wide volatile organic compound (VOC) and particulate matter (PM) emissions cap approved under Final Approval No. MBR-06-IND-019. This Modified Final Approval will supersede Final Approval No. MBR-06-IND-019 dated August 4, 2006 in its entirety.

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 “Air Pollution Control,” regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-N, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP’s review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air

pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner / operator "L-3 SSG" must comply in order for the Facility to be operated in compliance with this Plan Approval.

SPECIAL TERMS AND CONDITIONS

L-3 SSG is subject to, and shall comply with, the following special terms and conditions:

1. That this Modified Final Approval supersedes the previous Final Approval No. MBR-06-IND-019 issued to L-3 SSG-Tinsley on August 4, 2006 in its entirety, with the exception that all plan application materials submitted as part of the Plan Approval become part of this Plan Approval.
2. That L-3 SSG shall take immediate steps to abate any nuisance condition(s), including but not limited to visible emissions, noise, and odor, that may be generated by the operation of the subject facility.
3. That L-3 SSG shall limit its facility-wide volatile organic compounds (VOC) emissions to a total of no more than 0.5 ton per month and 2.5 tons per rolling 12 month period and facility-wide particulate emissions to a total of no more than 0.5 ton per month and 1.9 tons per rolling 12 month period from the subject processes and shall maintain records on-site to demonstrate compliance with these emissions/limitations.
4. That L-3 SSG shall control paint oversprays by Supra II HEPA particulate filters or equivalent with a minimum particulate collection efficiency of 97.5 percent by weight. The subject facility shall wash the spray gun and associated equipment in a gun washer unit; all coating mixtures shall be covered when not in use to minimize VOC emissions to atmosphere; and hazardous waste shall be properly handled and disposed of off-site.
5. That L-3 SSG shall record the amount of coatings used, and the VOC content of each coating used each month to calculate the resulting monthly and rolling 12-month facility-wide emissions of VOC. These records shall be maintained on-site for a minimum of five years and shall be made available for review by MassDEP personnel upon request.
6. That L-3 SSG shall record the amount of cleaning solvent (isopropyl alcohol) used each month to calculate the resulting monthly and rolling 12-month facility-wide emissions of VOC. These records shall be maintained on-site for a minimum of five years and shall be made available for review by MassDEP personnel upon request.

7. That L-3 SSG shall ensure that the maximum vapor pressure of cleaning solvent shall be less than 1.0 mm of Hg at 20 °C.
8. That L-3 SSG shall maintain an Environmental Logbook, or equivalent record keeping system, which shall record actions associated with environmental issues and overall emission changes at the facility. The facility shall record information such as the results of federal, state, or local environmental inspections; and measures taken to lower overall emissions to the environment (air, solvent waste, etc.). This logbook, or equivalent, shall be made available to MassDEP personnel upon request.
9. That a copy of this Approval letter shall be affixed adjacent to the subject equipment.

GENERAL CONDITIONS

L-3 SSG is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then L-3 SSG shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, L-3 SSG shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, L-3 SSG shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.
- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), L-3 SSG shall allow MassDEP and/or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
- E. This Plan Approval does not negate the responsibility of L-3 SSG to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.

- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by L-3 SSG to amend the Plan Approval conditions.
- J. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), L-3 SSG shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

MASSACHUSETTS ENVIRONMENTAL POLICY ACT

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain "Fail-Safe Provisions," which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

APPEAL PROCESS

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211



This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Should you have any questions concerning this Plan Approval, please contact Mr. Dhiraj Desai by telephone at 978-694-3282, or in writing at the letterhead address.

This final document copy is being provided to you electronically by the
Department of Environmental Protection. A signed copy of this document
is on file at the DEP office listed on the letterhead.

Dhiraj Desai
Environmental Engineer

This final document copy is being provided to you electronically by the
Department of Environmental Protection. A signed copy of this document
is on file at the DEP office listed on the letterhead.

Susan P. Ruch
Acting Permit Chief and Deputy
Regional Director
Bureau of Air and Waste

Enclosure: Original LPA - BWP AQ 01-B, and
Administrative Amendment of Previously Issued LPA - BWP AQ 34

cc: Board of Health, 121 Glen Road, Wilmington, MA 01887
Fire Headquarters, 32 Church Street, Wilmington, MA 01887
MassDEP/Boston (e-Copy) - Y. Tian
MassDEP/NERO (e-Copy) - M. Bolis, E. Braczyk
MassDEP/NERO (Hard Copy) – M. Persky, D. Desai